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December 29, 2022

By ECF

Honorable Robert M. Levy
United States District Court Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Government Employees Insurance Company, et al. v. Stallings, et al.
Docket No.: 1:22-cv-06306-DG-RML**

Dear Magistrate Judge Levy:

I write on behalf of the Plaintiffs and with the consent of counsel for the Defendants, Konata Solomon Stallings (A Sole Proprietorship) and Konata Solomon Stallings, PsyD (collectively, the "Stallings Defendants"), Mark Furman, Esq.

We have agreed to the terms of an amended stipulation and order that, pending the final outcome of the present action, (i) stays all pending collection lawsuits and arbitrations against GEICO, and (ii) enjoins the filing of new lawsuits and/or arbitrations against GEICO. We believe that the attached stipulation should be So-Ordered because there are collection attorneys who are prosecuting these lawsuits and/or arbitrations that from experience, may be unwilling to follow any instruction short of a court order.

A similar stipulation in this matter which also included terms that, pending the final outcome of the present action, stays all of the pending collection lawsuits and/or arbitrations against GEICO and enjoins the defendants from filing new lawsuits and/or arbitrations, among other terms, was submitted and denied by the Court without explanation. See Docket No. 15. Trying to interpret the denial, we have modified the language with the consent of Defendants' counsel to mirror the language of the prior stipulations/orders signed by Judges in this district, including a similar matter in which Magistrate Judge Cho so-ordered the stipulation in a matter before Judge Gujarati. Specifically, we would reference the following:

- Consent Order and Injunction, so-order by Magistrate Judge James R. Cho in GEICO v. Waldman, Docket No. 1:22-cv-02858-DG-JRC, at Docket No. 19, dated July 5, 2022;
- Consent Order and Injunction, so-ordered by Judge Edward R. Korman in GEICO v. Jacobson, Docket No. 15-cv-7236 (ERK)(RML) at Docket No. 42, dated February 3, 2016;



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- Consent Order and Injunction, so-ordered by Judge Edward R. Korman in GEICO v. Yoo, Docket No. 18-cv-5735 (ERK)(SJB) at Docket No. 37, dated December 19, 2018; and
- So-Ordered Stipulation, so-ordered by Magistrate-Judge Peggy Kuo in GEICO v. Seasoned Chiropractic, P.C., Docket No. 18-cv-5843 (JBW)(PK) at Docket No. 26, dated April 23, 2019.

A revised Stipulation and Order is attached to this letter, and counsel for the parties would respectfully request that it be So-Ordered by the Court at its convenience.

In addition, we would request that the Court set a date for an initial conference in this matter.

The Court's continuing attention to this matter is appreciated.

Respectfully submitted,

RIVKIN RADLER LLP
/s/ Michael Vanunu
Michael Vanunu

cc: All counsel via ECF